

1 JASON M. FRIERSON  
 2 United States Attorney  
 3 Nevada Bar No. 7709  
 4 JULIE A.K. CUMMINGS, SBN HI 10635  
 5 Special Assistant United States Attorney  
 6 Office of Program Litigation, Office 7  
 7 Social Security Administration  
 8 6401 Security Boulevard  
 Baltimore, MD 21235  
 Telephone: (410) 966-1551  
 Facsimile: (415) 744-0134  
 E-Mail: Julie.Cummings@SSA.gov

8 Attorneys for Defendant

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 KIM L. WILSON,

12 Plaintiff,

13 vs.

14 CAROLYN COLVIN,  
 15 Acting Commissioner of Social Security,<sup>1</sup>

16 Defendant.

Case 2:24-cv-01633-DJA

UNOPPOSED MOTION FOR  
 EXTENSION OF TIME  
*(FIRST REQUEST)*

19 Defendant, the Commissioner of Social Security, respectfully requests an extension of 30  
 20 days in which to respond to Plaintiff's Brief (ECF No. 15), filed on December 3, 2024, changing  
 21 the date on which Defendant's response is due from January 2, 2025, to February 3, 2025. This  
 22 is Defendant's first request for an extension to respond to Plaintiff's motion. Counsel for  
 23 Defendant conferred with a representative for counsel for Plaintiff on December 31, 2024, and  
 24 confirmed that Plaintiff has no objection to this request.

25  
 26 <sup>1</sup> Carolyn Colvin became the Acting Commissioner of Social Security on November 30, 2024. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Carolyn Colvin should be substituted for Martin O'Malley as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

Defendant makes this request in good faith and for good cause. I request this extension in order to further consider the administrative record in light of the issues raised in Plaintiff's motion. While I have been diligently trying to complete the review of this case file, I additionally have had several briefs due in recent days in this and other district courts. In the next month, I have seven more briefs due in various district courts of the Ninth Circuit, including this one. Accordingly, I ask the Court for more time so that I can properly represent the Commissioner in this and my other matters.

For these reasons, the Commissioner respectfully requests that the Court grant this motion for an extension of 30 days for Defendant to respond to Plaintiff's Opening Brief.

DATED December 31, 2024.

Respectfully submitted,

JASON M. FRIERSON  
United States Attorney

s/ Julie A.K. Cummings  
JULIE A.K. CUMMINGS  
Special Assistant United States Attorney  
Office of Program Litigation, Office 7

Attorneys for Defendant

IT IS SO ORDERED:

HON. DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 1/2/2025